



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

SFUND RECORDS CTR
2061576

February 6, 2004

Via Federal Express

Robin Lampkin-Isabel, Senior Group Counsel
Ashland Inc.
for Ashland, Inc.
5200 Blazer Memorial Parkway, DA-5
Dublin, OH 43017

Re: Omega Chemical Superfund Site Settlement Offer; Response Due May 7, 2004

Dear Robin Lampkin-Isabel:

Previously, the United States Environmental Protection Agency ("U.S. EPA") sent the person or entity identified above, or a predecessor (collectively referred to in this letter as "your company or organization") a De Minimis Notice Letter discussing the potential liability of your company or organization for the ongoing remediation of the Omega Chemical Superfund Site (the "Omega Site"). Those parties who may be responsible for the waste at Superfund sites are referred to as "potentially responsible parties" or "PRPs." PRPs include individuals, businesses, governmental agencies, and other types of organizations. You may be a PRP if you are:

- 1) a current owner or operator of the Omega Site;
- 2) the former owner or operator of the Omega Site during the period of waste disposal;
- 3) a party that arranged for the treatment, disposal, or transportation of hazardous substances to the Omega Site (a "generator"); or
- 4) a party that selected the Omega Site as a place to dispose of hazardous substances and who transported these substances to the Omega Site (referred to as "transporters").

The parties receiving this letter are all believed to be "generators" of wastes disposed at the Omega Site, and therefore "potentially responsible parties" at the Omega Site.

This letter is intended to offer your company or organization the opportunity to resolve its liability for waste that was disposed of at the Omega Site. The U.S. EPA is making this offer to your company or organization on very favorable terms, due to the comparatively small quantity of waste (referred to as a "de minimis" quantity) it is responsible for having contributed to the Omega Site.

Settlement Cost Summary
Ashland, Inc.
for ASHLAND CHEMICAL COMPANY

The payment required to join this settlement will depend upon the settlement option chosen. Please see the offer letter and the enclosed memoranda and proposed Administrative Order on Consent for explanations of the settlement options and payment instructions. **Do not enclose a check with your signature page; please wait until you receive a letter with payment instructions.**

SETTLEMENT OPTIONS

Ashland, Inc. settlement payment is:

3.6696 tons x \$12,632 per ton =

\$46,354

If Ashland, Inc. joins the expedited settlement, it will receive a **five percent (5%) discount**, reducing its settlement cost to:

\$44,036

Ashland, Inc. for ASHLAND CHEMICAL COMPANY

_____, by the
[Respondent]
duly authorized representative named, titled and signed below, hereby consents to this
Administrative Order on Consent and agrees to be bound by the terms and conditions thereof.

BY: _____

TITLE: _____

DATED: _____

Mailing name and address for this Respondent, or for his, her or its agent for service of process:

NAME: _____

TITLE: _____

ADDRESS: _____

**OPTIONAL ENCLOSURES- Please check the appropriate box if you are filing either of
the following optional applications:**

- ☐ Application for financial review to qualify for reduced payment (see note on following page)
- ☐ Application for volume review (see note on following page)

If you submit this signature page on time, and do not file either optional application above, your settlement payment will automatically be reduced by 5%. However, if you submit this signature page on time with a completed application for volume review, and EPA approves your application, your settlement payment will also be reduced by 5%.

NOTE REGARDING APPLICATION FOR FINANCIAL REVIEW TO QUALIFY FOR REDUCED PAYMENT: If the Respondent chooses this option, Respondent must submit the signature page together with the required financial statements, supporting documents, and signed certification, as described in the Omega Site De Minimis Settlement Offer Letter and its enclosures. If the Respondent provides these materials, the Respondent will have 14 days in which to withdraw the signature page after the U.S. EPA notifies Respondent of the result of the U.S. EPA's financial review.

NOTE REGARDING APPLICATION FOR VOLUME REVIEW: If the Respondent chooses this option, Respondent must submit the signature page together with the required review form, copies of relevant manifests, other supporting documents, and the Respondent's signed certification, as described in the Omega Site De Minimis Settlement Offer Letter and its enclosures. If the Respondent provides these materials, the Respondent will have 14 days in which to withdraw the signature page after the U.S. EPA notifies Respondent of the result of the U.S. EPA's volume review.

generator_name	ASHLAND CHEMICAL COMPANY
----------------	--------------------------

lc_name:	Ashland, Inc.
----------	---------------

lc_calc_volume:	3.6696 tons
-----------------	-------------

manifest_number	manifest_quantity_ton
-----------------	-----------------------

83029550	2.2935 tons
----------	-------------

83029551	1.14675 tons
----------	--------------

83029556	0 tons
----------	--------

88420453	0.22935 tons
----------	--------------

State of California Health and Welfare Agency
HAZARDOUS WASTE MANAGEMENT BRANCH
744 P Street
Sacramento, CA 95814

UNIFORM HAZARDOUS WASTE MANIFEST

Department of Health Services

Please print or type with ELITE type (12 characters per inch)

STATE ID NUMBER 83029550

GENERATOR NAME AND MAILING ADDRESS ASHLAND CHEMICAL CO. 150 WEST BROADWAY MESA, AZ 85202 AREA CODE/PHONE NUMBER (602)962-0376				MANIFEST DOCUMENT NUMBER					
TRANSPORTER NO 1 ASHLAND CHEMICAL CO. 150 WEST BROADWAY MESA, AZ 85202				VEH /CONTAINER NO 14372		EPA ID NUMBER AZD092671981			
TRANSPORTER NO 2/ALTERNATE TSD FACILITY				VEH /CONTAINER NO		EPA ID NUMBER			
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY OMEGA CHEMICALS BLVD. 12804 E. WHITE AVENUE, GAINESVILLE, FL 32602 (213)698-0991				EPA ID NUMBER CAD042245001					
PROPER U S D O T SHIPPING NAME AND HAZARD CLASS			UN/NA NUMBER	TOTAL QUANTITY	UNIT WT/VOL	CONTAINER NO TYPE	WASTE CAT NO	DISP METH	
FLAMMABLE LIQUID NOS			1003	110 G	G	01012 Dm	211		
FLAMMABLE LIQUID NOS			1983	440 G	G	01018 Dm	212		
COMPONENTS					CONC RANGE		UNITS		
					UPPER	LOWER	%	PPM	
TRICHLOROETHYLENE/ISOPROPANOL					60/50	40/30	70		
ACETONE/ISOPROPANOL/METHYL ETHYL KETONE/TOLUENE					25/45/25/5	25/25/25/5	70		
SPECIAL HANDLING INSTRUCTIONS TO BE PURCHASED BY OMEGA									
This is to certify that the above named wastes are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA						MO	DAY	YR	
Printed or typed full name and signature John GRADWELL John Gradwell						03	012	83	
<input type="checkbox"/> Check if continuation sheet is used Number of continuation sheets									
TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES						DATE REC'D & ACCEPTED	MO	DAY	YR
BILLY JOE VANCEY Billy Joe Vancey						013	012	83	
TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES						DATE REC'D & ACCEPTED	MO	DAY	YR
Printed or typed full name and signature									
DISCREPANCY INDICATION SPACE									
Facility owner or operator Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number. See instructions.						DATE RECEIVED & ACCEPTED			
TIM BALTIERA Tim Baltiera						EPA ID NUMBER	MO	DAY	YR
Printed or typed full name and signature						CAD042245001	03	012	83

TO BE FILLED IN BY GENERATOR

TO BE FILLED IN BY TRANSPORTER

TO BE FILLED IN BY TSD

GENERATOR SENDS THIS COPY TO DOHS

WASTE MANAGEMENT BRANCH

UNIFORM HAZARDOUS WASTE MANIFEST

CA 95814

or type with ELITE type (12 characters per inch)

STATE ID NUMBER **83029551**

GENERATOR NAME AND MAILING ADDRESS

MANIFEST DOCUMENT NUMBER

ASHLAND CHEMICAL CO.

150 WEST BROADWAY

MESA, AZ 85202

TRANSPORTER NO 1

(602)962-0376

EPA ID NUMBER

azdo92671981

ASHLAND CHEMICAL CO.

150 WEST BROADWAY

MESA, AZ 85202

TRANSPORTER NO 2/ALTERNATE TSD FACILITY

VEH /CONTAINER NO

EPA ID NUMBER

14372

AZD092671981

VEH /CONTAINER NO

EPA ID NUMBER

TREATMENT STORAGE OR DISPOSAL (TSD) FACILITY

EPA ID NUMBER

OMEGA CHEMICAL
12504 E. Whittier, Blvd.

Whittier, Ca 90602

(213) 698-0991

CAD042245001

PROPER U.S. DOT SHIPPING NAME AND HAZARD CLASS

UN/NA
NUMBER

TOTAL
QUANTITY

UNIT
WT/VOL

CONTAINER
NO TYPE

WASTE
CAT NO

DISP
METH

ORM-A

1710

275

B

0050

211

COMPONENTS

CONC RANGE
UPPER LOWER

UNITS
% PPM

TRICHLOROETHYLENE

80

65

70

oil

20

10

70

Water

10

5

70

SPECIAL HANDLING INSTRUCTIONS

TO BE PURCHASED BY OMEGA CHEMICAL

HW0031 HW0029 HW0032

This is to certify that the above named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

JOHN GRAWELL *John Grawell*

MO

DAY

YR

03

02

83

Check if continuation sheet is used Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

Billy Joe YANCEY *Billy Joe Yancey*

DATE
REC'D
&
ACCEPTED

MO

DAY

YR

03

02

83

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE
REC'D
&
ACCEPTED

MO

DAY

YR

DISCREPANCY INDICATION SPACE

Facility owner or operator Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD/F must complete waste number. See instructions.

DATE RECEIVED & ACCEPTED

EPA ID NUMBER

MO

DAY

YR

Printed or typed full name and signature

TIM BALTIERA *Tim Baltiera*

CAD042245001

03

02

83

GENERATOR SENDS THIS COPY TO DOHS

Please print or type. (Form designed for use on elite (12-pitch typewriter).

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

C A D 0 4 4 0 4 6 2 7 4 2 0 4 5 3

Manifest
Document No.

2. Page 1

1 of

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

Ashland Chemical Co.
6608 E. 26th Street, Los Angeles, CA 90040
4. Generator's Phone 213-724-2440

A. State Manifest Document Number
88420453

B. State Generator's ID
H A M Q 3 6 1 0 0 7 8 9 1 1

6. Transporter 1 Company Name

Nash Salvage, Inc.

8. US EPA ID Number

C A D 9 9 0 8 0 2 9 9 3

C. State Transporter's ID

012509

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone

213-948-8331

9. Designated Facility Name and Site Address

Omega Recovery Services
12504 E. Whittier Blvd.
Whittier, CA 90602

10. US EPA ID Number

I C I A D I 0 4 2 2 4 5 0 0 1

E. State Transporter's ID

C I A D 0 4 2 2 4 5 0 0 1

F. Facility's Phone
213-698-0341

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. Waste Resin Solution,
Flammable Liquid, UN 1866, (D001)

12. Containers

No. Type

01 01 1 D M

13. Total
Quantity

1 1 5 5 G

14. Unit
Wt/Vol

1 1 5 5 G

b.

c.

d.

12. Additional Descriptions for Materials Listed Above

Aged, unused isoset 2434 resin. See attached

13. Handling Codes for Wastes Listed Above

a. e/ b.

15. Special Handling Instructions and Additional Information

Gloves & Goggles
Keep from open flame.

Omega Profile #A-13191

16.

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Jeff Wieland

Signature

Jeff Wieland

Month Day Year

12/8/16/89

17. Transporter 1 Acknowledgement of Receipt of Materials

TR#7667

Printed/Typed Name

William Baker

Signature

William Baker

Month Day Year

12/8/16/89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

ANGEL TURKIOS

Signature

Angel Turkios

Month Day Year

12/8/11/89



FedEx Express
Customer Support Trace
3875 Airways Boulevard
Module H, 4th Floor
Memphis, TN 38116

U.S. Mail: PO Box 727
Memphis, TN 38194-4643

Telephone: 901-369-3600

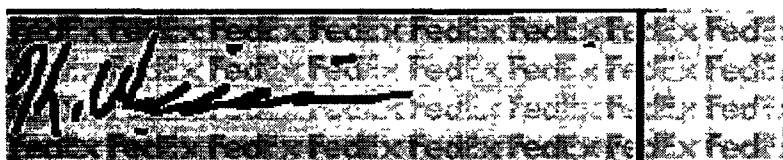
2/11/2004

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **640808390010**. Our records reflect the following information.

Delivery Information:

Signed For By: K.WILLIAMSON



Delivery Location: 5200 BLAZER PARKWAY

Delivery Date: February 9, 2004

Delivery Time: 0903

Shipping Information:

Tracking No: 640808390010

Ship Date: February 7, 2004

Recipient:

ROBIN LAMPKIN-ISABEL, SENIOR G
ASHLAND INC.
5200 BLAZER MEMORIAL PARK
DUBLIN, OH 43017
US

Shipper:

SAIC
SAIC
1404 FRANKLIN ST FL 6
OAKLAND, CA 946123210
US

Shipment Reference Information:

06-5026-01-0506-000

Thank you for choosing FedEx Express. We look forward to working with you in the future.

FedEx Worldwide Customer Service
1-800-Go-FedEx®
Reference No.: R2004021100112165733